

Before the  
Federal Communications Commission  
Washington, DC 20554

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In the Matter of

Amendment of Part 97 of the )  
Commission's Rules to Set )  
Aside a portion of the )  
Amateur 222 to 225 MHz Band )  
for Other than Repeater Use, and )  
Amend the Rules Relative )  
to Novice Privileges )

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

PR Docket 92-289

COMMENTS OF WILLIAM A. TYNAN W3XO

The writer has been a licensed amateur since 1945 and holds an Extra Class license. I have operated all amateur bands from 160 meters to 70 cm except for 30 meters, but most of my interest in amateur radio has been in the higher frequencies bands above 50 MHz. Before leaving the Maryland suburbs of Washington in late 1988, I had contacted 37 U.S. states on the 2 meter band and 17 states on the 220 MHz band. In the last year, I completed the ARRL DXCC (100 country) award on 6 meters.

For 18 years, I wrote the QST column The World Above 50 MHz. I believe that the experience of conducting this column, gives me a particular insight into VHF activity in all parts of the country.

I strongly support the Commission's the proposal to reserve a portion of the 222 to 225 MHz band for non-repeater use. I feel that it is essential that a portion of this band be available for weak signal/narrow band work.

Many VHF amateurs regularly use the 222 MHz band for long distance terrestrial communication. In years past, a number have used the 220 MHz band for Earth-Moon-Earth (EME) work. This activity has diminished over the past several years, primarily because of apprehension over the future of an amateur allocation in this part of the spectrum. This situation has not appreciably improved since the Commission's re-allocation of 220 to 222 MHz to the Land Mobile Service, as many amateurs are now concerned that there will be little room for weak signal operation on what remains of the band. The Commission's proposal to reserve, even a small portion of the 222 to 225 MHz band for non-repeater use, can be expected to improve this situation markedly.

Prior to the loss of 220 to 222 MHz, 220.0 to 220.5 MHz was established by the ARRL band plan for CW, SSB and similar narrow-band techniques. Furthermore, the Commission's Rules prohibited Repeater Stations from employing this same portion of the band. Since the Commission's action, a number of repeater operators, especially some in southern California, have expressed the

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opinion that the remaining 3 MHz wide band affords insufficient space for weak signal operation. Their contention appears to be that only repeater operation can, and should, be accommodated. One proposal went so far as to suggest that CW/SSB might be allowed to utilize just 10 kHz from 222.00 to 222.01. Under that same proposal, the first repeater input channel would be at 222.02. It is difficult to see how such a plan could work.

I feel that all users must make appropriate adjustments to their former operations, so that everyone can continue to have access to the band. Since forty percent of the band was lost to amateur use by the re-allocation, logic would imply that each type of operation should be left with roughly sixty per-cent of the space available previously. In the Referenced NPRM; the Commission, following ARRL Petition RM-7869, proposes 150 kHz for non-repeater operation. This is only thirty per-cent of the 500 kHz which was previously available to narrow band/weak signal modes. While I would prefer to have a wider segment reserved for non-repeater use, i.e. 300 kHz (60 % of the former allocation), I, nevertheless support Commission's proposal. However, I strongly opposes any attempt to reduce the width of the segment - as may be proposed by some parties. The proposal already represents the minimum bandwidth necessary to support viable weak signal operation.

I also support the Commission's proposal to allow Novice Class licensees to use the entire 222 to 225 MHz band. I particularly welcome SSB/CW operation by Novice licensees. It is noted that, assuming that the Commission adopts this portion of the NPRM, this will be the only portion of the VHF spectrum where Novices are allowed to operate in band segments used for weak signal/narrow band techniques.

Since repeater operation is not my prime interest, I feel less strongly about allowing Novices to become repeater licensees and controllers. However, it is observed, that operating a repeater generally requires greater, and different, knowledge than is currently tested in the Novice examination. I believe that it would be inappropriate to burden all applicants for the Novice license, by including repeater related questions on that exam. Thus, it would appear better to continue to require a Technician Class, or higher, license to engage in repeater operation.

Respectfully Submitted,

  
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